



July 26, 2010

Robert E. Feldman
Executive Secretary
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429
RIN 3064—AD60

Office of the Comptroller of the Currency
250 E Street, SW
Mail Stop 2-3
Washington, DC 20219
Docket ID: OCC-2010-0010

Jennifer J. Johnson
Secretary
Board of Governors of the
Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551
Docket No. R—1387

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552
Docket ID: OTS-2010-0017

Dear Sir or Madam,

The Conference of State Bank Supervisors (CSBS) and the American Council of State Savings Supervisors appreciate the opportunity to comment on the Interagency Notice of Proposed Rulemaking (NPR) regarding Community Reinvestment Act (CRA) regulations. CSBS and ACSSS strongly support the agencies' proposal to revise the term "community development" to include loans, investments, and services by financial institutions that support, enable, or facilitate projects or activities that meet the criteria described in HERA Section 2301(c)(3) and are conducted in designated target areas identified in plans approved by the United States Department of Housing and Urban Development (HUD) under the Neighborhood Stabilization Program (NSP). We believe that this proposal, if enacted, will provide considerable incentive to institutions to promote community development activities in their own assessment areas and the targeted areas. An important characteristic of the proposal is that it does not present any new requirements for institutions engaging in community development activities. Additionally, we endorse the provision of the proposal that prevents an institution from receiving CRA credit for performing NSP approved activities out of its assessment area before addressing the community development needs of its own assessment area.

With regard to the agencies question about whether CRA consideration should be limited to those NSP-eligible activities reflected in HUD-approved NSP plans, or to activities undertaken by financial institutions that support activities that have been funded by the NSP, CSBS and ACSSS do not believe that CRA consideration should be limited to either situation. While we understand that the criteria set forth in the NSP is a legislative matter, we believe that all activities that help to stabilize or revitalize designated target areas should be considered for CRA purposes. Furthermore, to address a more specific matter, we do not believe that there should be

a sunset date on the program as is discussed in the NPR. The need for NSP-eligible activities will persist, and the agencies can encourage banks to continue working to revitalize and stabilize designated target areas by allowing institutions to receive CRA credit consideration for performing these activities.

Thank you for the opportunity to comment. We look forward to working with the agencies on CRA related matters.

Neil Milner

A handwritten signature in black ink that reads "Neil Milner". The signature is written in a cursive style with a large, stylized "N" and "M".

President and CEO, CSBS

Doug Foster

A handwritten signature in dark ink that reads "Douglas B Foster". The signature is written in a cursive style with a large, stylized "D" and "F".

President, ACSSS